

DANIEL G. BOGDEN
United States Attorney
District of Nevada

MICHAEL A. HUMPHREYS
Assistant United States Attorney
333 Las Vegas Boulevard South, Suite 5000
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: michael.humphreys@usdoj.gov

Attorneys for the United States of America.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
CORNELIU WEIKUM and)
YULIA MISNA-HEFRON,)
)
Defendants.)

2:10-CR-579-GMN-(NJK)
~~2:10-CR-346-GMN-(NJK)~~
2:12-cr-00346-GMN-NJK

**UNITED STATES' MOTION TO CONTINUE
THE DEADLINE FOR THE UNITED STATES
TO FILE THE FINAL ORDER OF FORFEITURE**

The United States of America by and through Daniel G. Bogden, United States Attorney for the District of Nevada and Michael A. Humphreys, Assistant United States Attorney, respectfully moves this Court to grant the United States a 30-day continuance, or until April 23, 2015, to complete the preparation of the final Order of Forfeiture.

At the most recent hearing of this matter, presided over by the Court on January 22, 2015, the United States told this Court that of the hundreds of known victims in this case, the United States had notified all but one person, Andreas Strecker, who resides in Germany. This Court ordered the Government to continue in its efforts to properly serve Mr. Strecker, but if those efforts were not successful, the United States should file a motion to dismiss Mr. Strecker's claim by March 23, 2015.

1 The United States was successful in contacting Mr. Strecker, and counsel for the Government
 2 spoke to Mr. Strecker on or March 9, 2015. Like nearly every other victim in this case, Mr. Strecker has
 3 waived his right to file a claim and has consented to the Government filing the final order of forfeiture.¹

4 As such, the Government has commenced the preparation of the final order of forfeiture. There
 5 are over 250 victims in this case and each victim has to be accounted for in the final order of forfeiture,
 6 which means that each victim must be specified by name, date and type of service effort and date and
 7 type of response, if any. In addition, if a claim raised a legal challenge, the final order must address the
 8 manner of challenge, how and when the Government responded and how this Court ultimately ruled on
 9 that challenge.

10 While the Government has commenced the process of listing each person in the final order of
 11 forfeiture, the process is laborious and time-consuming because of the sheer number of victims who
 12 must be described. Accordingly, the Government requests an additional four weeks, or until April 23,
 13 2015, to file its final order of forfeiture.

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 24 ¹ We note that on March 23, 2015, this Court ordered the Government to file a response to Mr.
 25 Strecker's claim which was recently filed with this Court. Mr. Strecker's claim is dated February 26,
 26 2015. However, as already noted, counsel for the Government spoke with Mr. Strecker on March 9,
 2015, **after the date of the recent claim that he filed with his Court.** In that telephone conversation
 Mr. Strecker declared that he was waiving his right to file a claim and that the Government could
 proceed with filing the final order of forfeiture.

1 WHEREFORE, the United States moves this Court to grant its motion to extend the time for the
2 United States to prepare and file the final order of forfeiture in this case by an additional thirty (30)
3 days; or until April 23, 2015.

4 DATED this 23rd day of March 2015.

5 Respectfully submitted,

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/Michael A. Humphreys
9 MICHAEL A. HUMPHREYS
Assistant United States Attorney

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13 **IT IS SO ORDERED.**

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16 Gloria M. Navarro, Chief Judge
17 United States District Court

18 **DATED: 03/25/2015**
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